

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, MATT RICHTER, Special Agent (“SA”) with the Federal Bureau of Investigation (“FBI”), being duly sworn, do hereby state as follows:

INTRODUCTION

1. I am a SA with the FBI and have been so employed since March of 2019. I graduated from the FBI Academy in Quantico, Virginia where I received extensive training in the area of criminal investigations conducted by the FBI, including the investigations of financial crimes. I am currently assigned to the FBI Cleveland Division Headquarters and its Complex Financial Crimes Squad. I am empowered to make arrests for federal offenses. I am presently assigned to work a variety of criminal matters, including the investigations of financial crimes, which includes bank fraud, securities fraud, corporate fraud, mail fraud, wire fraud, money laundering and other violations of Federal Law. Prior to becoming a Special Agent for the FBI, I was a Certified Public Accountant, working at General Electric for three years and Deloitte for three years.

2. As a SA, I am a Federal Law Enforcement Officer within the meaning of Rule 41(a) of the Federal Rules of Criminal Procedure: that is a government agent engaged in the enforcement of criminal laws of the United States and, thereby, authorized to request the issuance of federal arrest warrants. As a Special Agent, I have participated in complex financial investigations. I have participated in the execution of arrest warrants.

3. The statements contained in this Affidavit are based upon, among other things, information provided by witnesses, records obtained through witnesses and through Federal Grand Jury Subpoenas, and my experience and training. Unless otherwise indicated, all conversations and statements described in this Affidavit are related in substance and in part. This

Affidavit is intended only to establish sufficient probable cause for the requested criminal complaint and arrest warrant and therefore does not set forth all of my knowledge about this matter.

4. This Affidavit is made in support of an application for a criminal complaint and arrest warrant for SHREYAS BALDEVBHAI CHAUDHARY (“CHAUDHARY”) for Title 18, United States Code, Section 1956(h), Money Laundering Conspiracy.

PROBABLE CAUSE

5. J.B. is a 77-year old resident of Salem, Ohio. J.B. was a widow with his wife passing away in or around August of 2023. In or around October of 2023, J.B. clicked on a pop-up advertisement while on his laptop computer. After clicking on the pop-up advertisement, J.B.’s computer froze with a message to contact Microsoft Security and provided a phone number to call. J.B. called the phone number and spoke to an individual who claimed to work for Microsoft using the alias of HOWARD. HOWARD told J.B. that his computer had been hacked and HOWARD put J.B. in contact with an individual, STACY BROWN (“BROWN”) who purported to work for J.B.’s financial institution (“FINANCIAL INSTITUTION-1”).

6. BROWN told J.B. that J.B. was a victim of identity theft and J.B. needed to send money to BROWN. BROWN instructed J.B. to purchase \$11,000 worth of gift cards. Over a two-day period, J.B. purchased approximately \$11,000 of gift cards, took photos of the gift cards and texted the photos to BROWN.

7. BROWN then instructed J.B. to withdraw approximately \$61,000 in cash from J.B.’s personal bank account. J.B. withdrew approximately \$61,000 and, based on instructions from BROWN, packaged the cash in a box and took photos of the cash and the box. J.B. sent these photos to BROWN. On or about October 21, 2023, BROWN instructed J.B. to wait on his

driveway with the package containing \$61,000. BROWN instructed J.B. to place the package inside the vehicle once the driver pulled up to J.B.'s residence and pulled down the back window of the vehicle. After waiting on the driveway for approximately 10 to 15 minutes, a black-colored Sport Utility Vehicle parked on the street in-front of J.B.'s driveway. After exchanging a password with the driver, J.B. placed the package containing approximately \$61,000 into the vehicle. The vehicle then left the residence in the direction of the entrance of the neighborhood.

8. On or about October 25, 2023, BROWN instructed J.B. to withdraw an additional \$50,000 from J.B.'s bank. BROWN told J.B. that J.B. needed to provide the money to another driver. J.B. went to his bank branch, who informed J.B. that they could not get the money until around November 2, 2023.

9. Suspecting potential fraud and elder abuse, a representative of FINANCIAL INSTITUTION-1 contacted the FBI regarding the actions of their customer, J.B. The FBI then contacted J.B., who told the FBI about J.B.'s interactions with BROWN and HOWARD. The FBI obtained approximately \$50,000 in controlled funds with the intent to conduct a controlled delivery of the funds to the driver who would pick up the cash from J.B.'s residence.

FBI OPERATIONS ON NOVEMBER 2, 2023 AND NOVEMBER 7, 2023

10. On or about November 2, 2023, BROWN instructed J.B. to return to his bank and withdraw approximately \$50,000. The FBI provided J.B. \$50,000 in controlled funds. In the presence of the FBI, BROWN telephonically instructed J.B. to photograph the \$50,000 and package the \$50,000 in a box. After the package was taped up, BROWN told J.B. that a driver would come to J.B.'s residence on November 2, 2023. A driver came to the vicinity of J.B.'s residence, but did not make contact with J.B. BROWN told J.B. that another driver would come on November 7, 2023 to collect the package containing \$50,000 from J.B.

11. On or about November 7, 2023, and in the presence of the FBI, J.B. had a phone call with an individual using the alias of “FRANKIE”. FRANKIE used the same phone number as BROWN. FRANKIE told J.B. that he was BROWN’s supervisor. A vehicle, a blue-colored Hyundai Elantra with Pennsylvania License Plate LZY6655 (“VEHICLE-1”), parked in-front of J.B.’s residence. FRANKIE instructed J.B. to place the package containing \$50,000 in VEHICLE-1. J.B. placed the package in VEHICLE-1.

12. After the package was placed in VEHICLE-1, VEHICLE-1 left J.B.’s residence. Members of the Columbiana County Sheriff’s Office pulled over VEHICLE-1 in the vicinity of J.B.’s residence. The driver, later identified as YASH NITINKUMAR RAVAL (“RAVAL”), was interviewed by the FBI. During the interview, RAVAL gave consent for the FBI to search VEHICLE-1 and RAVAL’s phone.

13. RAVAL was interviewed on or about November 7, 2023, and on or about November 13, 2023. During these interviews, RAVAL stated that an individual, using the alias of AL CAPONE, instructed RAVAL to make the pick-up from J.B. in Salem, Ohio on November 7, 2023. RAVAL communicated with AL CAPONE through an encrypted messaging platform (“COMMUNICATIONS COMPANY-1”). During their interactions AL CAPONE used an account (“AL CAPONE MESSAGING ACCOUNT”) with COMMUNICATIONS COMPANY-1. AL CAPONE MESSAGING ACCOUNT had the display name of “AL CAPONE”.

14. In addition to the package that RAVAL picked up from J.B., AL CAPONE asked RAVAL to pick-up packages throughout the United States. Many of these locations were too far for RAVAL to drive and, therefore, RAVAL would not pick up these packages. RAVAL did pick-up packages from other people. AL CAPONE provided RAVAL an address, and RAVAL

would drive to that address and roll down his back window. An individual would then place a package in RAVAL's vehicle. After driving away, RAVAL would open the package and confirm the contents with AL CAPONE. The packages would contain either United States Currency or gold bars. RAVAL would then drive the package to his residence in Erie, Pennsylvania. An individual would then drive to RAVAL's residence and pick up the package. Before picking up the package from J.B. in Salem, Ohio, RAVAL knew the package contained United States Currency.

REVIEW OF RAVAL'S PHONE

15. During November of 2023, the FBI conducted a consent search of RAVAL's phone. Through that review, the FBI identified evidence connecting RAVAL to package pick-ups from individuals who were victims of schemes similar to that of J.B. This evidence included text messages between RAVAL and AL CAPONE, videos of packages being opened in vehicles, notes in RAVAL's phone and other images on RAVAL's phone.

Victim P.B.

16. On or about November 3, 2023, AL CAPONE sent RAVAL a message through AL CAPONE MESSAGING ACCOUNT. The message contained an address in Westlake Village, California. Through open-source research and research on FBI databases, the FBI confirmed that the address was a residence associated with an 81-year old individual with the initials P.B. On or about November 9, 2023, SAs of the FBI interviewed P.B. at her residence. A follow-up interview was conducted by the FBI on or about November 13, 2023. P.B. told the FBI that on November 9, 2023, and immediately preceding the interview with the FBI, P.B. had just returned from P.B.'s bank where P.B. had initiated a payment to purchase approximately \$89,000 worth of gold from a third-party gold company. Based on instructions from an

individual using the alias of ADAM MILLER (“MILLER”), P.B. intended on receiving the approximately \$89,000 of gold, packaging the gold and giving the gold to a “courier” who would arrive at P.B.’s residence. P.B. was previously on her computer when a pop-up advertisement that claimed to be from Microsoft stated there was a problem with P.B.’s computer. P.B. called the number on the pop-up advertisement and eventually spoke to MILLER. MILLER told P.B. that her identity had been stolen and that the individuals who stole her identity opened up bank accounts in P.B.’s name to commit various crimes. As a result, there was an open investigation against P.B., and P.B. would not have access to any of the funds in her bank account, which could take upwards of six months, unless P.B. provided funds to MILLER.

17. Based on instructions from MILLER, P.B. provided United States Currency or gold to couriers who arrived at P.B.’s residence on three prior occasions. Each instance, P.B. placed the United States Currency or gold in a package. A driver would then come to P.B.’s residence. The driver rolled down their back window of their vehicle and P.B. placed the package in the vehicles. Each instance a different driver came to P.B.’s residence. MILLER told P.B. that couriers were Federal Agents. On or about October 21, 2023, P.B. provided \$70,000 of United States Currency to a courier. On or about October 25, 2023, P.B. provided \$137,000 of gold to a courier. On or about October 31, 2023, P.B. provided \$70,000 of gold to a courier. After talking to the FBI on or about November 9, 2023, P.B. realized that P.B. was a victim of a scam and did not give the additional \$89,000 of gold to a courier. P.B. lost a total of approximately \$277,000 through this scheme.

Victim J.G.

18. Through a review of RAVAL’s phone, the FBI reviewed a note created on or about October 29, 2023, on RAVAL’s phone. The note contained the name of an individual with

the initials of J.G. and an address in Washington D.C. (“ADDRESS-1”). RAVAL’s phone also contained a photo of two vehicles in-front of a building (PHOTO-1). PHOTO-1 had a date of on or about October 30, 2023. Using open-source research and FBI databases, the FBI confirmed that a 75-year old individual with the same name on the note was associated with ADDRESS-1. On November 20, 2023, the FBI interviewed J.G. J.G. fell victim to a similar scheme as J.B. and P.B where J.G. was told that his identity was compromised and used to commit various crimes. On numerous occasions, and at the direction of an individual using the alias of DAMIAN WILLIAMS (WILLIAMS), J.G. purchased gold, packaged the gold and provided the gold to a courier who went to J.G.’s residence. J.G. provided approximately \$709,308 worth of gold to couriers beginning in or around September of 2023. At the time of the interview, J.B. was in possession of an additional approximately \$99,000 worth of gold that J.B. purchased with the intent on providing to another courier at the direction of WILLIAMS. WILLIAMS provided J.B. with a photo identical to PHOTO-1. The purpose of WILLIAMS sending J.G. this photo was so that J.G. knew which vehicle belonged to the courier.

Victim M.R.

19. Through a review of RAVAL’s phone, the FBI reviewed a video (“VIDEO-1”) dated October 31, 2023, of an individual opening a package. The package had a handwritten paper on the front which stated the package was from an individual with the initials of M.R. and to WILLIAMS. The video was taken from inside a vehicle and showed an individual opening the package, which contained gold bars. One of the gold bars had a serial number of “AA46128”. VIDEO-1 did not show the individual opening the package but appeared to be taken from inside VEHICLE-1. Also, on RAVAL’s phone, there were images dated on October 31, 2023, of the

front of a building (PHOTO-2) and of an elderly individual talking on the phone (PHOTO-3). PHOTO-2 appeared to be taken from inside VEHICLE-1.

20. Using open-source research and FBI databases, the FBI identified an 82-year old individual with the same name on the package who was a resident of New York, New York. On December 4, 2023, the FBI received communications from an attorney who represented M.R. The communications stated that M.R. fell victim to a fraudulent scheme that was similar to the schemes that defrauded J.B., P.B. and J.G. From in or around July 2023 to November 2023, M.R. made approximately 33 purchases of gold totaling approximately \$3,136,082. At the direction of WILLIAMS, who claimed to be the United States Attorney for the Southern District of New York, M.R. packaged the gold and provided the gold to couriers who went to M.R.'s residence. One of these gold bars had the serial of "AA46128". M.R.'s attorney reviewed PHOTO-2 and PHOTO-3 with M.R. M.R. confirmed that PHOTO-2 was taken from the front of M.R. residence. M.R. confirmed that PHOTO-3 was a picture of PHOTO-3 that appeared to have been taken from M.R.'s webcam. M.R. had no knowledge that her photo was being taken.

21. During the consent search of VEHICLE-1, the FBI located two hotel receipts inside the vehicle. The first hotel receipt was for a one-night stay at a hotel on October 29, 2023, for "YASHRAVAL, YASH" in Rockville, Maryland. The hotel in Rockville, Maryland was approximately 17 miles from J.G.'s residence. The note of J.G.'s name and residence was dated October 29, 2023 and PHOTO-1 was dated October 30, 2023. The second hotel receipt was for a one-night stay at a hotel on October 30, 2023, in Newark, New Jersey. The hotel was approximately 15 miles from M.R.'s residence. VIDEO-1, PHOTO-2 and PHOTO-3 were dated October 31, 2023.

Victims F.M. and G.L.

22. Through a review of RAVAL's phone, at least two other victims were identified and interviewed by the FBI. A 78-year-old resident of Owings, Maryland with the initials of F.M. and a 74-year old resident of Heuvelton, New York with the initials of G.L. were interviewed by the FBI. F.M. and G.L. confirmed falling victim for similar schemes as described herein. F.M. and G.L. both provided United States Currency to couriers who went to their residence. Both F.M. and G.L. were actively being scammed when contacted by the FBI and would likely had lost more money had they not been notified they were a victim of a scam. F.M. lost approximately \$400,000 and G.L. lost approximately \$232,000. In total J.B., P.B., M.R., J.G., F.M., and G.L. reported losses of approximately \$4,820,390.

SHREYAS BALDEVBHAI CHAUDHARY

23. Based on a review of Federal Grand Jury records, the FBI learned that the AL CAPONE MESSAGING ACCOUNT, which was used to communicate with RAVAL, was opened with email address sbchaudhary71@****.com¹ ("EMAIL ADDRESS-1"). EMAIL ADDRESS-1 was also used to open an iCloud account ("CHAUDHARY ICLOUD ACCOUNT"). CHAUDHARY ICLOUD ACCOUNT was opened with the following information:

- a. Name: Shreyas Chaudhary.
- b. Address: Sector-26 N-37 Kh Road, Gandhinagar, Gujarat, India.
- c. Phone number: 919316166142

¹ Domain name redacted.

24. On or about July 18, 2023, CHAUDHARY submitted a B1/B2 travel visa to the United States of America. The application answered “No” to the question of “Have you ever been involved in, or do you seek to engage in, money laundering?” The application was submitted along with CHAUDHARY’s parents and listed the following information for CHAUDHARY:

- a. Name: Shreyas Baldevbhai Chaudhary
- b. Date of birth: May 27, 2000
- c. Indian passport number: N2059935
- d. Phone number: 919316166142
- e. Address: N 37 Green City, Sector 26, Gandhinagar, Gujarat, India, 382027

Trusha Chaudhary

25. On or about January 23, 2023, a 75-year-old resident of Canon City, Colorado with the initials S.R. was contacted by an individual using the alias of MARK WADSON (“WADSON”). WADSON convinced S.R. that S.R.’s identity was compromised and convinced S.R. to send \$11,000 to an “Olivia Martin” at a UPS access point in Riverdale, Illinois. S.R. sent \$11,000 as instructed by WADSON.

26. On or about January 25, 2023, Riverdale Police Department (“RPD”) intercepted an individual, TRUSHA CHAUDHARY (“T. CHAUDHARY”) at the CVS access point. T. CHAUDHARY was attempting to pick-up the \$11,000 package that was sent by S.R. When first questioned by RPD, T. CHAUDHARY provided a California Driver’s License with the name of “Olivia Martin”. This driver’s license contained a photo of T. CHAUDHARY. RPD identified the California Driver’s License as a fraudulent I.D. When confronted by RPD, T. CHAUDHARY provided her real identification documents.

27. On or about January 25, 2023, RPD contacted Homeland Security Investigations (“HSI”) regarding T. CHAUDHARY. T. CHAUDHARY told HSI that CHAUDHARY directed her (T. CHAUDHARY) to pick up the package at the CVS access point on or about January 25, 2023. T. CHAUDHARY, who has no family relation with CHAUDHARY, originally met CHAUDHARY in India before T. CHAUDHARY relocated to the United States in 2019. T. CHAUDHARY primarily communicated with CHAUDHARY through the AL CAPONE MESSAGING ACCOUNT².

28. In or around December of 2022, CHAUDHARY told T. CHAUDHARY that he knew of a way for T. CHAUDHARY to make money. CHAUDHARY explained that T. CHAUDHARY would pick-up packages and deliver them to individuals as directed by CHAUDHARY. In or around January of 2023 and at the direction of CHAUDHARY, T. CHAUDHARY sent a “passport-style” photograph of herself to CHAUDHARY via email. CHAUDHARY provided EMAIL ADDRESS-1 as the email for T. CHAUDHARY to use to send the photo. T. CHAUDHARY then received at least 14 fraudulent California Driver’s Licenses with her photo and different names, including the name of Olivia Martin. These fraudulent California Driver’s Licenses arrived to T. CHAUDHARY’s residence through mail. CHAUDHARY instructed T. CHAUDHARY to use these fraudulent identification cards when picking up packages. HSI took a photograph of these fraudulent identification cards, a copy of which is included below.

² During the time-period that T. CHAUDHARY was picking up packages at the direction of CHAUDHARY, the display name on AL CAPONE MESSAGING ACCOUNT was not “AL CAPONE” but was the same account that directed RAVAL to pick-up the packages.



29. Based upon interviews conducted by HSI and a review of phone records, it was learned that CHAUDHARY directed T. CHAUDHARY to pick-up numerous packages containing United States currency from victims of fraudulent schemes that were similar in nature to the scheme that defrauded S.R.

30. On or about October 11, 2023, HSI administered a simultaneous photo array that included a photograph of CHAUDHARY. T. CHAUDHARY was able to identify the photo of CHAUDHARY as the individual she had met in India and had directed T. CHAUDHARY to pick-up packages in the United States.

31. On November 7, 2023, the day that RAVAL picked up a package from J.B. and was interviewed by the FBI, RAVAL agreed to conduct a consensually recorded phone conversation between himself and an individual using the alias of “AL CAPONE”. RAVAL called “AL CAPONE” at the AL CAPONE MESSAGING ACCOUNT. On or about April 5, 2024, HSI played a recording of this phone conversation to T. CHAUDHARY. T. CHAUDHARY identified the individual using the alias of “AL CAPONE” as CHAUDHARY.

32. Through a review of a search warrant of EMAIL ADDRESS-1, HSI and FBI learned that the following web searches were conducted related to EMAIL ADDRESS-1:

- a. On or about October 26, 2022, the following website was visited: Complete List - Top 10 Real-Life Mob Bosses – TIME.
- b. On or about October 29, 2022, the following web search was conducted: “world don name”.
- c. On or about October 29, 2022, the following web search was conducted: “world don name al capone”.
- d. On or about October 30, 2023, a web search was conducted of ADDRESS-1, the residential address of J.G. As stated previously herein, RAVAL had a note in his phone of ADDRESS-1.

Identification of Shreyas Chaudhary

33. In addition to the identification of CHAUDHARY as the individual using EMAIL ADDRESS-1, AL CAPONE MESSAGING ACCOUNT and CHAUDHARY iCloud ACCOUNT, search warrants were obtained by HSI for these accounts. Through a review of these search warrants, additional information was observed which linked CHAUDHARY as the user of these accounts, which is further described below:

- a. A recovery phone number listed on EMAIL ADDRESS-1 was 91-931-616-6142 (“CHAUDHARY TELEPHONE NUMBER-1”), which was the same phone number provided by CHAUDHARY on his Visa application, previously detailed above, to the United States. CHAUDHARY listed this phone number as both his “Primary” and “Work” phone number on this Visa application.
- b. An email received by EMAIL ADDRESS-1 from Jio, an Indian-based Telecommunication company, listed CHAUDHARY TELEPHONE NUMBER-1 as the phone number associated with the account.
- c. On or about February 23, 2023, CHAUDHARY EMAIL ADDRESS-1 received a welcome email from India Infoline Finance Limited, a financial services company. The email contained an attachment with identifying information for the user, which included CHAUDHARY’s name, CHAUDHARY TELEPHONE NUMBER-1, and Indian Permanent Account Number (“PAN”).
- d. In or about September 2023, EMAIL ADDRESS-1 received numerous emails from incometax.gov.in, which is the email address for India’s Taxing Agency. Among these emails were income tax return acknowledgements for CHAUDHARY which referenced CHAUDHARY’s name and PAN. These acknowledgements included summary level detail of CHAUDHARY’s income taxes, including the amount of earnings and taxes owed.
- e. A review of CHAUDHARY iCloud ACCOUNT showed multiple images and photos of CHAUDHARY as the user of CHAUDHARY iCloud ACCOUNT, which matched the appearance of the photo provided by CHAUDHARY on his Visa application.

- f. On or about March 10, 2023, EMAIL ADDRESS-1 received an invoice from Apple.com. This invoice listed billing information that matched the subscriber information for the CHAUDHARY iCloud ACCOUNT.
- g. EMAIL ADDRESS-1 listed a contact titled “Papa” with telephone number 91-820-018-4376 (“TELEPHONE NUMBER-2”). TELEPHONE NUMBER-2 was provided by BALDEVBHAI CHAUDHARY (“B. CHAUDHARY”) on his Visa application. CHAUDHARY lists B. CHAUDHARY as his father on his Visa application.

IP Address Analysis

34. The FBI conducted Internet Protocol Address (“IP Address”) analysis regarding IP Addresses that accessed the AL CAPONE MESSAGING ACCOUNT and the CHAUDHARY iCloud ACCOUNT. This analysis revealed that between January and February of 2024, approximately 33 unique IP Addresses accessed both the AL CAPONE MESSAGING ACCOUNT and the CHAUDHARY iCloud ACCOUNT. Approximately 30 of these 33 IP Addresses accessed these two accounts on the same day.

CONCLUSION

35. Based upon the totality of the facts and circumstances set forth herein, and based upon my training and experience, there is probable cause to believe, and I do believe, SHREYAS BALDEVBHAI CHAUDHARY committed a violation of Title 18, United States Code, Section

1956(h), Money Laundering Conspiracy. Accordingly, I respectfully request that the Court issue a warrant authorizing the arrest of SHREYAS BALDEVBHAI CHAUDHARY.



Matt Richter
Special Agent
FBI

Sworn to via telephone after submission by reliable electronic means. Fed. R. Crim. P. 4.1 and 41(d)(3).



THE HONORABLE CARMEN E. HENDERSON
UNITED STATES MAGISTRATE JUDGE

August 8, 2024

DATE